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TJX COMPANIES, INC.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

CAROLYN DUNN LUKSZA &
PATRICIA FOSER, INDIVIDUALLY
AND ON BEHALF OF OTHERS
SIMILARLY SITUATED,

Plaintiff,

vs.

TJX COMPANIES, INC., a Delaware
corporation, d/b/a "TJ MAXX" DOES I
through X; and ROE Corporations I
through X, inclusive,

Defendant.

Case No. 2:11-CV-01359-JCM-GWF

**JOINT STIPULATION FOR
CONTINUANCE OF JANUARY 27, 2012
HEARING ON DEFENDANT'S
EMERGENCY MOTION FOR
PROTECTIVE ORDER**

For the reasons set forth below, Plaintiffs Carolyn Dunn Luksza and Patricia Foser (“Plaintiffs”) and Defendant TJX Companies, Inc. (“TJX” or “Defendant”) respectfully submit this Joint Motion for Continuance of the January 27, 2012 Hearing, seeking a brief continuance of the hearing and Extension of Time for Plaintiffs to Respond to Defendant’s Emergency Motion for Protective Order. The facts germane to this motion are as follows:

1. On January 20, 2012, Defendant filed an Emergency Motion for Protective Order. [Dkt. No. 35]

2. By order of the Court [Dkt. No. 36], a hearing on Defendant’s Emergency Motion for Protective Order has been scheduled for January 27, 2012.

3. Lisa A. Schreter, lead counsel for the Defendant, will be unable to appear for the hearing in person due to a family medical emergency which requires her spouse to undergo major non-elective hip rescession surgery on January 27, 2012.

4. On January 24, 2012, Ms. Schreter contacted Plaintiffs’ counsel and sought their consent to a brief continuance of the January 27, 2001 hearing. Plaintiffs’ counsel consented to this request and joins in the present motion. During this conversation, Plaintiffs’ counsel sought a brief extension of time in which to file their response to Defendant’s Emergency Motion for Protective Order. Defendant’s counsel agreed to this request.

5. On January 25, 2012, Ms. Schreter contacted the Court and was advised that the hearing could be held telephonically and rescheduled to January 30, 2012 at 9:30 AM.

6. Specifically, the Parties hereby stipulate that:

- a. The requested continuance and extension of time to respond are not sought for any improper purpose; and
- b. The Parties have jointly agreed to the relief indicated below.

7. The Parties respectfully request the following relief:

- a. The hearing on Defendant’s Emergency Motion For Protective Order be continued until January 30, 2012 at 9:30 AM (PST), and the Parties be allowed to appear for this hearing telephonically; and

b. The time for Plaintiffs' response to Defendant's Emergency Motion for Protective Order be enlarged from January 25 until January 27, 2012.

January 25, 2012

January 25, 2012

/s/ Andrew L. Rempfer

/s/ Lisa A. Schreter

ANDREW L. REMPFER, ESQ.

WENDY M. KRINCEK, ESQ.

JAMIE S. COGBURN, ESQ.

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RICHARD W. BLACK, ESQ.

COGBURN LAW OFFICES

LITTLER MENDELSON, P.C.

Attorneys for Plaintiffs

Attorneys for Defendant

IT IS SO ORDERED

Date: January 26, 2012



George Foley, Jr.
United States Magistrate Judge

NOTE: The parties are instructed to call telephone number: **(702) 868-4910, password 123456**, five (5) minutes prior to the hearing time. Please remain on the line until such time as the Court joins the call and convenes the proceedings. The use of a cell phone or speaker phone during the call is **prohibited**. *The call must be made using a land line.*